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Worldwide Regulatory & Government Affairs

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November 3, 2005

Dr. Robert J. Moore
Branch Chief, Compliance & Enforcement Branch
Office of Nutrition Products, Labeling & Dietary Supplements
FOOD & DRUG ADMINISTRATION (HFS-800)
5100 Paint Brush Parkway
College Park, Maryland 20740

NOV - 9 2005

Ref: **Tri-Shield™ Dietary Supplement (N635-00)**

Dear Dr. Moore:

Pursuant to 21CFR§101.93, please be advised Herbalife International of America, Inc. has introduced Tri-Shield™ dietary supplement. Labeling bears the following structure/function claim:

Tri-Shield™ This proprietary blend contains 100% Neptune Krill Oil (NKO®), which helps support the heart muscle, protect cell membrane health and maintain cholesterol levels already within a normal range*.

Tri-Shield™ dietary supplement is labeled and promoted with statements provided for in Section 403(r) (6) of the Federal Food, Drug and Cosmetic Act.

The product label prominently bears the required ruled DSHEA disclaimer statement: "These statements have not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure or prevent any disease."

Please be advised that we have substantiation on file that these claims are truthful and not misleading.

If you have any questions, please do not hesitate to ask.

Sincerely,


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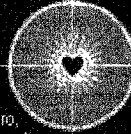
HERBALIFE.

Tri-Shield™

Endorsed by Dr. Lou Ignarro,
1996 Nobel Laureate in Medicine

Taking Nutrition to Heart™
With Omega-3 Fatty Acids from
Neptune Krill Oil
Dietary Supplement

30 SOFTGELS



*This statement has not been evaluated by the Food and Drug Administration. This product is not intended to diagnose, treat, cure or prevent any disease.

Tri-Shield™ This proprietary blend contains 100% pure Neptune Krill Oil (NKO®) which helps support the heart muscle, protect cell membrane health and maintain cholesterol levels already within a normal range.*

DIRECTIONS: One softgel, one to two times per day.

NOTICE: This product is not intended for use by children, pregnant or lactating women. Individuals who are using blood thinning medication or have an allergy to shellfish should consult with their physician about the use of essential fatty acid supplements.

AVISO: Este producto no está destinado a niños, mujeres embarazadas o lactantes. Individuos que consumen medicamentos anticoagulantes o que tienen alergia a los crustáceos deben de consultar con su médico acerca del uso de suplementos de ácidos grasos esenciales.

Contiene ingredientes de trolé y soja.

We offer a 30-day money-back guarantee to assure your complete satisfaction. This exclusively formulated product is only available through Herbalife Independent Distributors.

Supplement Facts

Serving Size: 1 Softgel
Servings Per Container: 30

Amount Per Serving	% DV**
Vitamin E	
Ethylated Tocopherol	2 IU 7%
Neptune Krill Oil (NKO®)	300 mg
Omega-3 Fatty Acids	77 mg
from Neptune Krill Oil (providing Eicosapentaenoic Acid (EPA) and Docosahexaenoic Acid (DHA))	
Percent Daily Values (DV) are based on a 2000 calorie diet.	
* Daily Value (DV) not established.	

OTHER INGREDIENTS: Gelatin, Glycerin, Natural Lemon Flavor, Olive Oil and Vanilla Flavor. Contains krill and soybean ingredients.

HERBALIFE INTERNATIONAL OF AMERICA, INC., Los Angeles, CA 90080-0210, U.S.A.
NKO® is a registered trademark of Neptune Technologies & Resources Inc., Quebec, Canada

MADE IN U.S.A.
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